Remark

Applicants respectfully request reconsideration of this application as amended. Claims 1-4, 9, 11-13, 15, 17, 18, 20, 24 and 26 have been amended. No claims have been cancelled. Therefore, claims 1-27 are present for examination.

35 U.S.C. §103 Rejection

Tajima in view of Milne

The Examiner has rejected claims 1-27 under 35 U.S.C. §103(a) as being unpatentable over Tajima et al., JP-6169440 ("Tajima"), in view of Milne et al., US. 2002/0180890 ("Milne").

Tajima shows a television with modules 21-25 that can be attached or detached from the TV main body 1. Covers 31 are used to cover each of the module holes. Figure 4 would appear to show an antenna 71 coupled to some of the modules 21, 24, 25, 26. Modules 22 (A/V switcher) and 23 (audio amplifier) are instead coupled to the display 11 and speaker 61, respectively.

Milne shows a two chassis architecture with a processing chassis 50 and a presentation chassis 12 (Figure 3). As explained in paragraphs 53 and 54, the same processing chassis is used for all models but different presentation chassis are used for different markets and feature sets. The presentation chassis has the A/V inputs, switching, tuning, decoding and similar functions. The different configurations are made at the factory and while the different presentation chassis are interchangeable from an engineering perspective, they are not interchangeable by a typical user.

In Milne, the Examiner has pointed to a USB bus, apparently the interface shown for the I/O Bridge 60 of the processing chassis 50 in Figure 3. The specification provides no purpose or use for the USB interface and there is none illustrated. It is unlikely that it connects somehow to, for example, the tuners 20, 22 of the presentation chassis 12 of the same Figure 3. Since no such connection is shown or suggested.

The Examiner also points to buses 51 between the I/O Bridge, CMOS

Programmable Logic and ROM. This also does not appear to have any connection to the tuners 20, 22. This is especially true given that the specification teaches that "the processing chassis and the presentation chassis modules can operate independently of one another." (paragraph 54)

Claim 1 is amended to include command and control signals on the second bus connector. Tajima shows a single bus connector 216 of Figure 2 and does not mention whether command and control signals are carried on this bus.

In Tajima, Figures 1 and 2 suggest that the modules are completely autonomous. The left module 21 has on its face a power switch 211, a pilot lamp 212, a remote control sensor 213, and a channel display 214. Note that in Claim 1 the control and command are between the tuner cartridge and the tuner system not between a module and a system user. Accordingly, there would appear to be no reason to provide control and command to or from the module. The other components in Figure 4 that are not in a module are simply a connection panel 41, a graphics driver 51, a picture tube 11 and a speaker 61. These types of components do not normally have any controls or commands to send, nor any reason to receive them. There is also nothing in Tajima to suggest that they do.

The Examiner has referred to the USB interface of Milne to show command and control. As is clear from Milne's Figure 3, the tuners have no connection with the USB bus. They connect via video outputs (note the one-way right arrows) buses 118 and 119. There is no explanation of how the tuners might be controlled. In any event, the tuners are not part of a cartridge so the particular connections may be any of a variety of types known in the art. There is no suggestion in this reference of the type of structure spelled out in Claim 1. Claims 9, 15, and 24 have similar limitations.

With respect to Claim 6, 7, and 8, the Examiner has relied upon Official Notice, however, while there may be cartridges with fingers and housings, there are no such cartridges that carry tuners and the two bus connections recited in these claims. The television market is large and innovative and there are a wide range of devices that have been developed for television over the last 60 years, yet the Examiner has not found a removable tuner cartridge with the type of structure recited in Claim 1. Applicant submits that this is a significant indication that such a tuner cartridge is not obvious. The same applies also to Claim 9. Notice how in Tajima there is a cover plate but no housing, no fingers, no gripping surface, etc. The same reasoning applies also to Claim 9.

In addition, Claim 4 has been amended based on paragraph 24 of the specification. Applicants respectfully submit that none of the references suggest a tuner cartridge that determines an address by polling its pins when connected to the tuner system. The same may be said of Claim 18.

Claim 21 refers to a feature described in paragraph 25 that allows the tuner to receive one or both of two different antenna signals. This is not suggested in either of the references.

The remaining claims not discussed above depend from one of the claims discussed above and are believed to be allowable on those grounds, *inter alia*.

Conclusion

Applicant respectfully submits that the rejections have been overcome by the amendment and remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicant respectfully requests the rejections be withdrawn and the claims as amended be allowed.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Request for an Extension of Time

Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

Charge our Deposit Account.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: May 8, 2007

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